EXHIBIT B

From: Korologos, Lisa (USANYS)
To: Matthew L. Schwartz
Subject: RE: US v Devon Archer, S1 16 Cr. 371 (RA)
Date: Tuesday, November 7, 2017 11:22:08 AM

Good morning Matt,

As set forth in my production cover letter, we are treating the non-privileged documents (pr.review.archer_00000001-00019666 and pr.review.joint_00000001-00000530) and the documents that are potentially non-privileged under the crime-fraud exception (pr.review.archer_00019667-00020819 and pr.review.joint_00000531-00000639) separately. My only goal right now is to find out if you plan to claim attorney-client privilege on behalf of your client over any of the documents in the first group. As you've likely noticed if you have reviewed any of these communications, most are clearly not privileged and are only being produced for your review in an abundance of caution. I'd like to release the non-privileged documents to the trial team as soon as possible so please let me know on or before November 20, 2017, if you intend to claim privilege over any of these documents.

After the non-privileged documents are released to the trial team, the trial team will assess whether to seek a crime-fraud exception ruling. As I noted in my letter, I will not be releasing any of the potential crime-fraud documents to the trial team unless and until there is "an agreement or judicial determination with respect to the applicability and scope of the crime-fraud exception." To be perfectly clear, the crime-fraud exception is not being asserted at this stage so there is not yet an assertion for you to object to or oppose. Although not required, it would help move things along if you let me know if there are any documents in the potential crime-fraud documents that you will not be claiming privilege over so that those can also be released to the trial team (because obviously the crime-fraud exception only applies if the document is privileged).

Please let me know if you have still have any questions and I'm available to discuss the non-privileged documents as soon as you are ready.

Thanks, Lisa

Lisa P. Korologos
Assistant United States Attorney
Southern District of New York
One St. Andrews Plaza, Room 929
New York, NY 10007
(212) 637-2406

-----Original Message-----
From: Matthew L. Schwartz [mailto:mlschwartz@BSFLLP.com]
Sent: Monday, November 06, 2017 9:19 PM
To: Korologos, Lisa (USANYS) <LKorologos@usa.doj.gov>
Subject: RE: US v Devon Archer, S1 16 Cr. 371 (RA)

Great, thank you. I would welcome the opportunity to hear about how the government is intending to proceed.

Matthew L. Schwartz
BOIES SCHILLER FLEXNER LLP
212-303-3646 (Direct)
646-337-5787 (Mobile)

-----Original Message-----
From: Korologos, Lisa (USANYS) [mailto:Lisa.Korologos@usdoj.gov]
Sent: Monday, November 6, 2017 8:49 PM
To: Matthew L. Schwartz

Subject: Re: US v Devon Archer, S1 16 Cr. 371 (RA)

Matt,

It sounds to me like your assumptions about the process being proposed are not accurate so I'll provide more details, and hopefully clarity, in the morning.

Thanks, Lisa

Lisa P. Korologos
Assistant United States Attorney
Southern District of New York
One St. Andrews Plaza
New York, NY 10007
(212) 637-2406

On Nov 6, 2017, at 5:23 PM, Matthew L. Schwartz
<mlschwartz@BSFLLP.com<mailto:mlschwartz@BSFLLP.com>> wrote:

Thank you. I have a few questions in order to assess the government's assertion that some of these documents fall under the crime-fraud exception. Before I ask, can you please confirm whether it is the wall team or the trial team that will pursue the crime-fraud argument? As you may be aware, I have previously expressed my objection that the wall team have any involvement in the assertion of the crime-fraud exception. I presume, based on your letter, that the government has ignored that objection and the wall team will be pursuing the issue, but on the off chance that it had not, I didn't want to pollute any member of the wall team with my questions. Thanks.

-mls

Matthew L. Schwartz
BOIES SCHILLER FLEXNER LLP
212-303-3646 (Direct)
646-337-5787 (Mobile)

From: Korologos, Lisa (USANYS) [mailto:Lisa.Korologos@usdoj.gov]
Sent: Thursday, November 2, 2017 4:37 PM
To: Matthew L. Schwartz
Cc: sserpe@serperyan.com<mailto:sserpe@serperyan.com>
Subject: US v Devon Archer, S1 16 Cr. 371 (RA)

Dear Counsel,

Please see attached letter, the password for the data is SDny_20171102.

Thank you,

Lisa P. Korologos
Assistant United States Attorney
Southern District of New York
One St. Andrews Plaza, Room 929
New York, NY 10007
(212) 637-2406

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